

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

**Professional Fee Matters Concerning the
Jackson Walker Law Firm**

4:23-cv-04787

**NOTICE OF INTENT TO ADDUCE TESTIMONY FROM A REMOTE LOCATION
BY TELEPHONE AND VIDEO TECHNOLOGY**

1. This Notice is filed pursuant to BLR 9017-1(c)(2)(B) by Kevin M. Epstein, United States Trustee for Region 7 (the “U.S. Trustee”).¹
2. This Notice pertains to the matters scheduled for trial in this case on May 12–16, 2025, May 19–22, 2025, and May 27–30, 2025.²
3. The U.S. Trustee may call the following witnesses to testify at the scheduled trial by telephone and video technology.³

¹ The Bankruptcy Court’s March 5, 2025, Scheduling Order required parties to file a remote witness notice no later than April 14, 2025, utilizing the Bankruptcy Court’s Form No. 9017-1(c)(2)(B). Bankr. Case No. 23-645 at ECF No. 611, ¶ 3(c). This Notice follows the language set forth by the Bankruptcy Court’s Form.

² The District Court’s Order Withdrawing the Reference provides that “All orders entered in these cases thus far, including those concerning discovery, STAND unless and until this Court...orders otherwise.” ECF No. 31 at p. 7. The U.S. Trustee therefore construes the Court’s Order to leave in place deadlines set forth in the Bankruptcy Court’s Scheduling Order (Bankr. Case No. 23-645 at ECF No. 611) until a further order is entered.

³ Each witness listed either resides outside of Texas or expressed additional, extenuating circumstances that require the flexibility that a remote appearance provides. The U.S. Trustee anticipates that trial testimony of each witness herein (with the exception of the U.S. Trustee’s expert witnesses) would not exceed one hour. The U.S. Trustee further submits that remote testimony from these witnesses permits increased schedule flexibility and obviates any weather-related or other travel delays that may impact the Court’s schedule. To eliminate any technological concerns, the U.S. Trustee will ensure compliance with the Court’s remote appearance requirements.

Additionally, in an abundance of caution, the U.S. Trustee lists his experts, in the event their remote appearance facilitates a streamlined and expeditious trial schedule, or is necessary because

Alan Carr (New York, New York)

Thomas Fawkes (Chicago, Illinois)

Steve Panagos (New York, New York)

Gregory Pesce (Chicago, Illinois)

Elizabeth “Liz” Miller (Huntsville, Texas)

Michael K. Robinson (North Carolina)

Anna Rotman (New York, New York)

Brandy Treadway (Dallas, Texas)

Aparna Yenamandra (New York, New York)

Richard Davis (New York, New York) (UST Expert witness)

Jonathan Lipson (Philadelphia, Pennsylvania) (UST Expert witness)

4. Any party-in-interest may object to this notice within 3 days of its filing on the Court’s docket. If no party-in-interest files a timely objection, the Court will allow the identified witnesses to give testimony remotely using the Court’s telephone and video technology. If the Court does not authorize the testimony to be taken remotely, the Court will schedule a date for the witness's testimony to be given live in open court. Both the witness(es) and the objector must appear in person at the scheduled date.

5. This Notice may be withdrawn at any time prior to the scheduled hearing or trial.

Date: April 14, 2025

Respectfully Submitted,

KEVIN M. EPSTEIN
UNITED STATES TRUSTEE
REGION 7, SOUTHERN AND WESTERN
DISTRICTS OF TEXAS

By: /s/ Vianey Garza

VIANEY GARZA

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of the occurrence of any weather events that would make travel difficult or impossible. The U.S. Trustee anticipates that testimony from his experts will exceed one hour.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic means for CM/ECF system users on April 14, 2025.

/s/ Vianey Garza

Vianey Garza, Trial Attorney